

### REMARKS

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

Claims 1-12 were pending in this application. Claims 8 and 9 have been amended to correct minor matters of form and new claims 13-18 have been added to even more clearly distinguish the present invention. Support for the new claims can be found in, e.g., paragraph [0032] and Figure 2 of the present application. Claims 1-18 will be pending herein upon entry of this Amendment. For the reasons stated below, Applicant respectfully submits that all claims pending in this application are in condition for allowance.

In the Office Action, claims 8 and 9 were objected to because of informalities; claims 1-8 and 11-12 were rejected under 35 U.S.C. §102(b) as being anticipated by Tso et al. (U.S. 6,421,733 B1); and claims 9-10 were rejected under 35 U.S.C. §103(a) as being unpatentable over Tso et al. in view of Eichstaedt et al. (2005/0027741 A1). To the extent the objection and rejections might still be applied to claims presently pending in this application, they are respectfully traversed.

Regarding the objection to claims 8 and 9, it is believed that the amendments set forth above adequately address the Examiner's concerns. Withdrawal of the objection is therefore respectfully urged.

Applicants respectfully traverse the §102 and §103 prior art-based rejections for the following reasons. The present invention is related to systems and methods for providing multimedia message service (MMS) interoperability between an initiating (or first) carrier and a destination (or second) carrier. MMS is a growing service that is most commonly used to send

data (e.g., pictures, video, etc.) between mobile telephones. *See*, e.g., paragraph [0013] of the present application. MMS is a next generation service in the mobile telecommunications arena, and, while having significant promise as a mobile telephony service, nevertheless presents a host of issues to carriers. Notably, the implementation of MMS functionality may differ among carriers such that an MMS message sent by a first user may not be compatible with the capabilities of a second carrier's implementation. From a business perspective, this will cause fewer mobile users to use MMS messaging since users will not be confident that MMS messages will actually reach the intended recipient. *See*, e.g. paragraph [0014] of the present application.

The present invention addresses the myriad carrier interoperability issues associated with MMS messaging by implementing a transcoding facility that is disposed between mobile telephone service providers. As recited in, for example, claim 1, the present invention provides multimedia message service (MMS) interoperability between a first carrier and a second carrier by receiving an MMS message from a first carrier and then querying a number portability database to determine an identity of a second carrier to which the MMS message is intended to be sent. Thereafter, the methodology queries a carrier profile repository to access a carrier profile for the second carrier, wherein the carrier profile includes information regarding an MMS format acceptable to the second carrier. The MMS message is then transcoded in accordance with the carrier profile to generate a transcoded MMS message, and the transcoded MMS message is then sent to the second carrier.

Thus, as is clear from claim 1 (as well as independent claims 6 and 12) the present invention processes MMS messages that are being passed between carriers. These "carriers" are clearly mobile telephone service providers, as is now expressly recited in new claims 14, 16 and

18. Likewise, the MMS messages themselves, although being passed among mobile telephone service providers (carriers), are typically initiated from mobile telephony users, as now explicitly recited in new claims 13, 15 and 17. Indeed, one of the main points of the invention is to provide interoperability between carriers so that end users of the MMS service will actually have confidence in the system and use it, thereby generating additional revenue for the respective carriers.

Tso et al. describe a system for dynamically transcoding data transmitted between computers, and focus on data transmitted between a server and a client. *See, e.g.,* col. 2, lines 44-47 of Tso et al. However, Tso et al. description is absent any description of mobile telephony, "MMS," "carriers" (in the way intended by the instant application), a "number portability database," or "carrier profiles" as recited in the independent claims of the present application.

Specifically, col. 2, lines 56-58 of Tso et al. that is cited in the Office action merely discloses requesting or receiving "information." However, this "information" does not necessarily suggest an MMS message, as claimed. Likewise, Figure 3 of Tso et al. does not disclose or even suggest a "carrier" as recited in the pending claims. Rather, Figure 3 merely shows a network client 12 that is in communication with transcoding server 34. Neither of these components is a "carrier" like the carriers recited in the claims of the present application, namely mobile telephone service providers.

Furthermore, client preference table 26 is not at all analogous to the claimed "number portability database," which has a common meaning to those skilled in the art of telecommunications. A number portability database is a repository in which mobile telephone

users' telephone numbers are matched with carriers (e.g., mobile telephone service providers). Client reference table 26 and its associated description in Tso et al. does not anticipate (indeed does not even come close to mentioning) a "number portability database" as recited by the pending claims.

Further still, contrary to the assertion made in the Office Action, Tso et al. do not disclose a "carrier profile," let alone a carrier profile that includes information regarding an MMS format acceptable to another carrier, as claimed. While Tso et al. disclose examples of types of information which may be used to dictate which transcode service providers 24 are invoked (col. 7, lines 15-17), the examples given simply do not encompass a "carrier profile" or an "MMS format."

The Eichstaedt et al. reference does not overcome the deficiencies of Tso et al.

Accordingly, since the cited prior art fails to disclose each and every element recited in the claims, the §102 and §103 rejections must be withdrawn.

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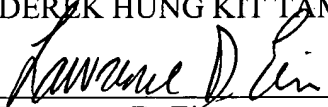
In view of the foregoing all of the claims in this case are believed to be in condition for allowance. Should the Examiner have any questions or determine that any further action is desirable to place this application in even better condition for issue, the Examiner is encouraged to telephone applicants' undersigned representative at the number listed below.

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Attachments: None

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